**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Andria N. Jackson, Debtor,	:	Bankruptcy No. 17-10770-sr Chapter 13
Carrington Mortgage Services, LLC, Secured Creditor,	:	Related to Document No. 10
Andria N. Jackson, Debtor / Respondent,	:	Hearing Date and Time: May 24, 2017 at 10:00 a.m.
and Frederick L. Reigle, Trustee / Respondent.	:	

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

Carrington Mortgage Services, LLC, ("Secured Creditor"), by and through its counsel, Matthew C. Waldt, Esquire, as and for its objection to confirmation of Debtor's Chapter 13 Plan, respectfully states as follows:

1. Debtor is Andria N. Jackson.

2. On February 2, 2017, Debtor filed a petition pursuant to Chapter 13 of Title 11 of the United States Code. Debtor is the owner of the real property commonly known as 28 Prout Drive, Coatesville, PA 19320 (the "Property").

3. Secured Creditor holds the first mortgage on the Property.

4. Secured Creditor has not yet filed its Proof of Claim but anticipates doing so shortly. As such, Secured Creditor reserves the right to supplement this objection.

5. As will be more fully set forth in the aforementioned Proof of Claim, as of the date of the filing of the instant Chapter 13 petition, total arrears due to Secured Creditor through the Plan are approximately $17,230.39.

6. Debtor's Chapter 13 Plan provides for payment of mortgage arrears to Secured

Creditor in the amount of $12,000.00.

7. The Chapter 13 Plan does not provide for Mortgagee to receive distributions with a value equal to the allowed amount of its claim as required by 11 U.S.C. § 1325(a)(5)(B)(ii).

8. The Chapter 13 Plan is not feasible.

9. Secured Creditor objects to the Debtor's Chapter 13 Plan as same does not propose to cure the entire pre-petition delinquency due to Secured Creditor and thus the Plan is not feasible as filed.

WHEREFORE, Secured Creditor respectfully requests that confirmation of Debtor's Chapter 13 Plan be denied unless modified to provide for payment of pre-petition arrears in full, as set forth above, due to Secured Creditor, and for such other just and appropriate relief as the Court may deem proper.

Respectfully submitted,
MILSTEAD & ASSOCIATES, LLC

DATED: April 5, 2017

/s/Matthew C. Waldt
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